



FARM BUREAU SAN DIEGO COUNTY

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RESPONSES

January 16, 2009

General Plan Update
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear General Plan Project Planners:

After a review of the Draft General Plan Documents we would like to submit the following comments:

Page 2-4 Protecting Our Agriculture – To be correctly representative of the local farm community the statement in the first sentence on this page should be modified to read "...for the production of healthy food and *ornamental crops* for our population..."

Revision made as suggested.

Page 2-13 Guiding Principle 8 – Though agriculture is an important contributor to the regional economy, we believe it is incorrect to state that agriculture represents one-fifth of the regional economy.

Revision made as suggested.

Page 5-14 COS 6.2 – We believe the use of the term "appropriate" is subjective and the comment that the appropriate size should be one acre is limiting. San Diego County has an abundance of very small farms, many less than one acre. Though these operations are most likely to be operated as part time enterprises, their cumulative contribution is substantial and should not be discouraged or set aside by an arbitrary acreage size.

Reference to "one acre" has been removed.

Page 10-6 Glossary – We ask that the definition of "Agriculture" be expanded to state "...the production of food, fiber, and *ornamentals*..."

This definition has been deleted.

Page 10-6 Glossary – It seems odd that that "Agricultural/Urban Interface" goes beyond a pure definition and includes a discussion about conflicts that may exist. This might lead the reader to assume that conflicts at the interface are the norm.

This definition has been deleted.

Page 10-12 Glossary – Suggest the addition of a definition for "Conservation Easements."

Definition added.

Thank you for this opportunity to comment.

Sincerely,

Eric Larson
Executive Director

January 28, 2009

Dear Mr. Muto:

The San Diego Association of Realtors® (SDAR) has been active in the general plan process for approximately 10 years. This plan is now moving forward at an accelerated pace, which is a benefit to everyone concerned with the long term use of the resources this county possesses.

To further this process, we are including the following documents that include comments from SDAR's Interest Group Committee Representative, Liz Higgins, on the draft general plan released for public review in November 2008:

1. Comments on the Draft General Plan Land Use and Housing Elements;
2. Goals and Policies on the Land Use Element; and
3. Goals and Policies on the Housing Element.

Thank you for the opportunity to take part in this important project. Please contact Liz Higgins at 619-441-2717 for further clarification or information.

Sincerely,



Erik Weichelt
President, SDAR



Mike Mercurio
Chief Executive Officer, SDAR

Cc: Eric Gibson

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Noted.

RESPONSES



San Diego Association of Realtors

To: Devon Muto, General Plan Project Manager
Eric Gibson, Director, Department of Planning and Land Use

Comments on the Draft General Plan Land Use and Housing Elements

LAND USE FRAMEWORK

Introduction: The stated available land use area remaining in private ownership in unincorporated San Diego County as stated in the introduction is approximately 5.6% or 128,369 acres. The area available for future development must be used to its highest and best use taking into consideration all impacts to the land, including the fact that population numbers will increase with the need to accommodate this future growth.

Noted.

Under the Purpose and Scope: Community Plans, paragraph 2, states “An Urban Limit Line and/or Village Boundary may be defined in the Community Plan as a community-specific growth boundary that identifies an area to which development should be directed. These boundaries may also serve as the basis for community specific goals and policies.” This statement must be deleted as this plan does not include an Urban Limit Line and this statement is not appropriate to this plan as stated in the policies.

An Urban Limit Line is still in effect in the Valle de Oro community.

Also stated in the 4th paragraph, you state that the “Communities Plans have the same weight of law and authority in guiding their physical development.” It is a concern that the included community plans will override the Board of Supervisors’ ability to plan any future development in the county.

Community Plans and the General Plan are all adopted by the Board of Supervisors and have equal weight.

Under the Regional Categories: bullet - remove “sprawl” from “Preventing sprawl development,” etc; the word “sprawl” is a negative terminology and is not defined in the glossary. Good land use planning precludes the need to define “sprawl.”

Staff appreciates your comment, but does not agree. Sprawl is a commonly used term and the rural lands category is intended to minimize this type of development.

Land Use Goal 6.3 provides for “clustering” for the benefit of both the developer and the preservation of resources. SDAR strongly requests that properties in the Rural Lands Land Use Category be eliminated from this provision as being impractical in areas of the county where large scale major subdivisions do not occur. Minor subdivisions of less than 5 parcels in areas of 1 dwelling unit per 20 acres or more provide for preservation of natural resources due to parcel size and other current restrictions placed on development. Many properties in this category are held in bulk for the future benefit of family members or agricultural purposes.

Staff appreciates your comment, but does not agree. There are benefits to clustering in rural lands, where the majority and largest blocks of sensitive resources are located; these include minimizing disturbing sensitive resources, mitigate what could impact sensitive resources, and ensuring improved fire defensibility.

Land Use Goal 6.4 Sustainable Subdivision Design is the goal for establishment of the Conservation Subdivision Ordinance. SDAR strongly opposes including properties in the Rural Lands Land Use Category in this requirement. This proposed policy will have a detrimental impact on certain landowners, whose property has been severely downzoned in the proposed land use maps, will have additional reduced development potential. This

The Conservation Subdivision Program (CSP) is designed to help achieve the full planned density on lands impacted by sensitive environmental resources.

mandate may be unfair or impose additional burdens on these land owners. Due to these burdens this policy should be voluntary without additional conservation requirements imposed if the property owner opts out of the policy.

Another important issue in the rural area is fire protection. According to an article in the San Diego Union Tribune dated October 26, 2008, the county budget for clearing brush is one million dollars which tackles only 1200 acres per year. This is an additional argument to allow private property owners to provide the resources to maintain their property which when left the use of the land provides the incentive to be responsible stewards.

HOUSING ELEMENT

SDAR is in favor of goals that provide housing to meet the needs of all levels of income households. With this in mind, we support meeting the Regional Housing Needs Allocation of 12,358 residential units as stated in the housing goals. SDAR also supports the goal of reducing constraints that could impede the development of housing for all income groups.

Housing Goal H1.9 Affordable Housing through General Plan Amendments. This policy requires that the Board of Supervisors pass an ordinance requiring inclusionary housing, which is not a county policy at this time. SDAR is opposed to mandatory inclusionary housing and requests that this goal be removed from the proposed Housing Element. This policy, used in some counties, has shown to increase the price of market rate housing due to the cost differential of the subsidized units being passed to other properties in the project. See H3.4 Inclusionary housing should be voluntary and incentive based. SDAR supports H3.5.

RESPONSES

Staff intent is for CSP projects to be designed to maximize defensibility from wildland fires.

Noted.

Staff appreciates your comment, but does not concur that this policy mandates inclusionary housing. This policy is intended to affect only large-scale projects that require a GPA.

RESPONSES

GOALS AND POLICIES

GOAL LU1

Primacy of the Land Use Element. A land use plan and development that sustain the intent and integrity of the Community Development Model and the boundaries between Regional Categories.

Policies

LU 1.1 Assigning Land Use Designations. Assign land use designations on the Land Use Map in accordance with the Community Development Model and boundaries established by the Regional Categories Map.

LU 1.2 Regional Categories Map Amendments. Carefully review General Plan and Specific Plan amendments requiring a change to the Regional Categories Map to ensure consistency with the General Plan guiding principles and policy framework.

LU 1.3 Initiation of Plan Amendments. Require approval from the Board of Supervisors to initiate General Plan Amendments for private projects.

LU 1.4 Leapfrog Development. Prohibit leapfrog development that is inconsistent with the Community Development Model and Community Plans. Leapfrog development is a negative connotation and precludes large scale developments that incorporate village centers

LU 1.5 Development Patterns. Designate land use designations in patterns to create or enhance livable communities and preserve surrounding rural lands.

LU 1.6 Village Expansion. Permit expansion to the Village Regional Category only where contiguous with an existing or planned Village and where the following criteria are met:

- Potential Village development would be compatible with environmental conditions and constraints, such as topography and flooding
- Potential Village development would be accommodated by the General Plan road network
- Public facilities and services can support the expansion without a reduction of services to other County residents
- The expansion respects and enhances community character, the scale, and the orderly and contiguous growth of a Village area

LU 1.10 Density Transfers on Project Sites. Permit transferring units between designations on contiguous land within the project site to provide flexibility in project design only when appropriate and consistent with the applicable Community Plan and approved by Major Use Permit or Specific Plan. The policy is not intended to allow a

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Deleted: Leapfrog development is defined as Village densities located away from established Villages or outside established water and sewer service boundaries. ¶

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Deleted: LU 1.7 Relationship of County Land Use Designations with Adjoining Jurisdictions. Prohibit the use of established or planned land use patterns in nearby or adjacent jurisdictions as precedent or justification for land use designations of unincorporated County lands. ¶

¶
LU 1.8 Conversion of Public Lands to Private Ownership. Assign lands designated for public use that change in ownership from public to private with a designation of Rural Lands 80 until the appropriate long term use of the property is determined and a general plan amendment approved for redesignation of the property. This policy applies to areas on the Land Use Map designated Public/Semi Public Facilities, Federal and State Lands, and Tribal Lands. ¶
¶

LU 1.9 Maximum Residential Densities. Determine the maximum number of dwelling units permitted within the boundaries of any subdivision or single lot based on the applicable land use designation(s). When the total number of dwelling units is less than one, this shall be interpreted as permitting one dwelling unit. When more than one dwelling unit is permitted, fractional dwelling units are rounded down to the nearest whole number of dwelling units. ¶
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LU-1.2 -- Staff appreciates your comment, but does not agree. After over ten years of gaining general consensus on a land use map, and to retain a certain level of trust with communities, there needs to be some form of assurance that this map, and its guiding principles, will not be easily changed.

LU-1.4 – Staff feels that the explanation of leapfrog development is more specific and offers a better description than what is being proposed by your comments.

LU-1.6 – Revisions made as recommended.

LU-1.7 thru LU-1.9 – It appears that you are recommending that these policies be deleted, although rationale for this recommendation is not provided. The policies in the Land Use Element are the result of consensus building efforts with community representatives and have gone through extensive scrutiny.

RESPONSES

project to receive more units than is established by the Land Use Maps nor to supersede Housing Element requirements related to achieving the County's Regional Housing Needs Allocation.

GOAL LU2

Maintenance of the County's Rural Character. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.

LU2.1 Community Plans. Maintain Community Plans, as part of the General Plan, to guide development to reflect the character and visions for each individual unincorporated community.

LU2.2 Development Densities and Lot Sizes. Assign densities and minimum lot sizes in a manner that respects and enhances the character and economic vitality of each unincorporated community.

Deleted: is compatible with

LU2.3 Relationship of Land Uses to Community Character. Ensure that the land uses and densities within any Regional Category or Land Use Classification depicted on the Land Use Map to reflect the issues, character, and development objectives for a Community Plan area.

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Deleted: unique

This needs to be coordinated with the RHNA in which 30 units per acre is mandated.

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LU2.4 Greenbelts to Define Communities. Establish and maintain greenbelts between communities in order to reinforce the identity of individual communities.

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"Sprawl" is a negative term that is not defined in the glossary.

Unrealistic as to good planning processes.

Deleted: LU2.5 Development near Neighboring Jurisdictions. Require that development in the proximity of neighboring jurisdictions retain the character of the unincorporated community and use buffers or other techniques where the neighboring jurisdiction is incompatible

LU2.6 Commercial Viability. Ensure that new commercial centers maintain or enhance the viability of the community.

Deleted: existing commercial areas.¶¶

LU2.7 Mitigation of Development Impacts. Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

Deleted: adverse

GOAL LU3

Diversity of Residential Neighborhoods. A land use plan that accommodates a range of building and neighborhood types suitable for a variety of lifestyles, ages, affordability levels, and design options.

LU3.1 Diversity of Residential Designations and Building Types. Maintain a mixture of residential land use designations and development regulations that accommodate various building types and styles.

LU-2.2 – DPLU appreciates your comment but does not agree. This policy is the result of consensus building efforts.

LU-2.3 – Although you do not offer any explanation for the additional text, staff does not agree that it is necessary as it does not address the overall intent of the policy.

LU-2.4 – See staff response concerning sprawl in the Land Use Framework section.

LU-2.5 – See staff comment on previous page concerning the policies that you are recommending for deletion.

LU-2.6 – Staff appreciates your comment, but does not agree. The intent of the policy is to address new commercial development that could be economically detrimental to the existing commercial core of a community.

LU-2.7 – Revisions made as recommended.

RESPONSES

LU3.2 Mix of Housing Units in Large Projects. Require new large residential developments (generally greater than 200 dwelling units) to integrate a range of housing types and lot and building sizes when consistent with the Community Plan.

LU3.3 Complete Neighborhoods. Require new development sufficiently large to establish a complete neighborhood (typically more than 1,000 dwelling units) to include a neighborhood center within easy walking distance of surrounding residences.

GOAL LU4

Interjurisdictional Coordination. Coordination with the plans and activities of other agencies that relate to issues such as land use, community character, transportation, energy, other infrastructure, public safety, and resource conservation and management in the unincorporated County and the region.

LU4.1 Regional Planning. Participate in regional planning to ensure that the unique communities, assets, and challenges of the unincorporated lands are appropriately recognized.

LU4.2 Review of Impacts of Projects in Adjoining Jurisdictions. Review, comment, and coordinate when appropriate on plans, projects, and proposals of overlapping or neighboring agencies to support compatibility with the Community Development Model and the General Plan.

LU4.3 Relationship of Plans in Adjoining Jurisdictions. Consider the plans and projects of overlapping or neighboring agencies in the planning of unincorporated lands, and invite comments and coordination when appropriate.

LU4.4 Development Compatibility with Military Facilities. Ensure compatibility of new development with the current and planned mission and operations of U.S. government military installations.

Comment: LU4.5 Annexed lands are usually for the benefit of the annexing agency for a higher and better use.

LU4.6 Planning for Adequate Energy Facilities. Participate in the planning of regional energy infrastructure with applicable utility providers to ensure plans are consistent with the County's General Plan and Community Plans and minimize adverse impacts to the unincorporated County.

Deleted: when consistent with the Community Plan.¶

LU-3.3 – Staff appreciates your comment but does not agree. This policy is the result of consensus building efforts.

Deleted: LU4.5 Annexations with Incompatible Land Uses. Oppose annexations by neighboring cities that would result in land uses incompatible with unincorporated lands.¶

LU-4.5 – Policy has been revised to include coordination with LAFCO.

GOALS AND POLICIES

GOAL LU5

RESPONSES

Climate Change and Land Use. A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health.

LU5.1 Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that supports multi-modal transportation, including walking, bicycling, and the use of public transit.

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LU-5.1 – Edits incorporated as recommended.

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LU5.2 Sustainable Planning and Design. Require that new development consider, and incorporate when feasible, sustainable planning and design to conserve land and resources.

LU5.3 Rural Land Preservation. Conserve the most significant rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) that provide carbon sequestration benefits. (Not defined in the glossary.)

Deleted: Preserve existing undeveloped and

LU-5.3 – Reference to carbon sequestration benefits has been removed from policy. Other edits have been made as appropriate.

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LU5.4 Planning Support. Support, and undertake when possible, planning efforts that promote infill and redevelopment of uses that accommodate walking and biking within communities.

LU5.5 Projects that Impede Non-Motorized Travel Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts to existing or planned routes would occur, ensure that impacts are mitigated and acceptable alternative routes are implemented.

Deleted: . Prohibit projects that impede bicycle and walking access, e.g., large parking areas that cannot be crossed by non motorized vehicles, and new developments that block through access on existing or potential bicycle and pedestrian routes.¶

LU-5.5 – Edits generally incorporated as recommended.

GOAL LU6

Development—Environmental Balance. A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.

LU6.1 Environmental Sustainability. Support the protection of critical and sensitive natural resources and the long-term sustainability of the natural environment.

LU6.2 Reducing Development Pressures. Assign low density or low intensity land use designations to areas with sensitive natural resources.

LU6.3 Conservation Oriented Project Design. Support conservation-oriented project design when appropriate and consistent with the applicable Community Plan. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character.

RESPONSES

Comment: Rural Lands should be decoupled from this ordinance since the low densities of properties that have been severely downzoned are not appropriate for clustering in minor subdivisions.

LU6.4 Sustainable Subdivision Design. Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce development footprints, use sustainable infrastructure practices, and provide public amenities. Comment: Rural Lands should be exempt from this requirement since land is being conserved by land owners due to large parcel sizes. This may be unfair or impose additional burdens on some landowners who are impacted by downzoning.

LU6.5 Sustainable Stormwater Management. Require development to minimize the use of impervious surfaces and use other Low Impact Development techniques as well as a combination of site design, source control, and stormwater best management practices.

LU6.6 Integration of Natural Features into Project Design. Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and avoidance of sensitive environmental resources.

LU6.7 Open Space Network. Encourage contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect existing or planned recreational opportunities.

LU6.8 Development Conformance with Topography. Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable.

LU6.9 Protection from Hazards. Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards.

LU6.10 Protection from Wildfires and Unmitigable Hazards. Ensure that new development in very high hazardous wildfire areas complies with the County's building and fire code and fire safety planning guidelines. Comment: Most of the unincorporated area is considered a high fire hazard area. This was not what was considered when designing the land use maps. This policy must be stated in a manner that is consistent with the draft land use maps since this policy can not be implemented.

LU6.11 Flooding. Document and annually review areas within floodways and 100- and 200 year floodplains to ensure areas subject to flooding are accurately mapped in accordance with AB 162 (enacted January 1, 2008). (See also Policy S8.1)

GOAL LU7

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LU6.5 S

Deleted: Assign land uses and densities in a manner that minimizes

Deleted: or other unmitigable hazardous areas.¶

LU-6.3 – See previous staff edits.

LU-6.4 – See previous staff edits.

LU-6.10 – Staff does not concur with proposed edits. Policy is intended to document the GPU mapping objectives, and establish direction for any future GPAs, where low density development is assigned in high fire threat areas.

RESPONSES

Agricultural Conservation. A land use plan that retains and protects farming and agriculture as beneficial resources that contribute to the County's rural character.

LU7.1 Agricultural Land Development. Protect agricultural lands, that support continued agricultural operations.

Comment: lower-density land use designations do not protect agricultural lands. Instead, they devalue land values, thereby jeopardizing financing for farming operations on the land.

Deleted: with lower density land use designations

LU-7.1 – Staff does not agree. The intent is to protect agricultural lands from encroachment from incompatible land uses, which is often higher density residential uses. Policy COS-6.4 is intended provide financial support.

LU7.2 Parcel Size Reduction as Incentive for Agriculture. Allow for reductions in lot size when large tracks of land are preserved in conservation easements for continued agricultural use.

Deleted: existing historically agricultural

GOAL LU8

Aquifers and Groundwater Conservation. Sustainable aquifers and functional groundwater recharge areas.

LU8.1 Density Relationship to Groundwater Sustainability. Require land use densities in groundwater dependent areas to be consistent with the long-term sustainability of groundwater supplies, except in the Borrego Valley.

LU8.2 Groundwater Resources. Require development to identify adequate groundwater resources in groundwater dependent areas, as follows:

- In areas dependent on currently identified groundwater overdrafted basins, prohibit new development from exacerbating overdraft conditions. Encourage programs to alleviate overdraft conditions in Borrego Valley.
- In areas without current overdraft groundwater conditions, prohibit new development from creating an overdraft condition.

Comment: This policy would be extremely hard to enforce or interpret.

LU8.4 Program for Borrego Valley Aquifer. Develop a program to slow the overdrafting and extend the life of the aquifer supporting the Borrego Valley.

Deleted: LU8.3 Groundwater Dependent Habitat. Discourage development that would draw down the groundwater table to the detriment of groundwater dependent habitat.

LU-8.3 – Staff does not agree with deleting this policy. This is meant to protect natural resources from development that does not have sufficient infrastructure to support it.

GOALS AND POLICIES

GOAL LU9 Distinct Villages and Community Cores. Well-defined, planned, and developed community cores, such as Villages and Town Centers, that contribute to a community's identity and character.

LU9.1 Village and Community Core Planning. Encourage the delineation of and development of more detailed planning direction for the character, design, uses, densities, and amenities of Village areas, Town Centers, and other community cores in Community Plans to assist in the future planning of residences, infrastructure, businesses, and civic uses.

LU9.2 Density Relationship to Environmental Setting. Assign Village land use designations in a manner consistent with the Community Plan, community character, and environmental constraints. In general, Village areas that contain more slopes or other environmental constraints should receive lower density designations.

LU9.3 Village and Community Core Guidelines and Regulations. Support the development and implementation of design guidelines, Village-specific regulations for roads, parking, and noise, and other planning and regulatory mechanisms that recognize the unique operations and character of Villages and Town Centers. Such mechanisms should ensure that new development that respects and enhances the overall scale and character of established neighborhoods.

Deleted: be compatible with

LU-9.3 – Edits made as recommended.

LU9.4 Infrastructure Serving Villages and Community Cores. Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores and the intensity of development allowed by the Land Use Map.

LU9.5 Village Uses. Encourage development of distinct areas within communities offering residents places to live, work, and shop, and neighborhoods that integrate a mix of uses and housing types.

LU9.6 Town Center Uses. Locate commercial, office, civic, and residential land uses in the Town Centers of Villages or at transportation nodes. Exceptions to this pattern may be allowed for established industrial districts and secondary commercial districts or corridors.

LU9.7 Town Center Planning and Design. Plan and guide the development of Town Centers as the major focal point and activity node for Village areas. Utilize design guidelines to respect and enhance the character of a community. Roadways, streetscapes, building facades, landscaping, and signage within the town center should be pedestrian oriented. Wherever possible, locate public facilities, such as schools, libraries, community centers, and parks in Town Centers and Villages.

Deleted: maintain

Deleted: unique

LU-9.7 – Edits made as recommended.

LU9.8 Village Connectivity and Compatibility with Adjoining Areas. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with the Community Plan and surrounding areas.

LU 9.9 Residential Development Pattern. Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.

RESPONSES

LU9.10 Internal Village Connectivity. Require that new residential development in Village areas be integrated with existing neighborhoods by providing connected and continuous street, pathway, and recreational open space networks.

LU9.11 Integration of Natural Features in Villages. Promote the protection and integration of natural features, such as unique topography or streambeds, into Village projects when appropriate.

GOAL LU10

Function of Semi-Rural and Rural Lands. Semi Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate rural communities.

Deleted: unique

LU10.1 Residential Connectivity. Require residential development in Semi-Rural and Rural areas to be integrated with existing neighborhoods by providing connected and continuous street, pathway/trail, and recreational open space networks.

LU10.2 Development—Environmental Resource Relationship. Encourage development in Semi Rural and Rural areas to conserve the unique natural features, and avoid sensitive environmental resources and natural hazard areas.
Comment: The land use map and other requirements in themselves are the definition of rural character.

Deleted: Require

Deleted: preserve rural character,

LU10.3 Village Boundaries. Use Semi-Rural and Rural land use designations to define the boundaries of Villages and serve as buffers between communities.

LU10.4 Commercial and Industrial Development. Limit the establishment of commercial and industrial uses in Semi-Rural and Rural areas that are outside of Villages (including Rural Villages) to minimize vehicle trips and environmental impacts.

GOAL LU11 Commercial, Office, and Industrial Development. Commercial, office, and industrial development that is sited and designed to enhance the character of each unincorporated community and to minimize vehicle trip lengths.

Deleted: appropriately

Deleted: unique

LU11.1 Location and Connectivity. Encourage the location of commercial, office, and industrial development in Village areas with high connectivity and accessibility from surrounding residential neighborhoods.

LU11.2 Compatibility with Community Character. Require that commercial, office, and industrial development be located, and designed to respect and enhance the character of the community.

Deleted: scaled, and

Deleted: to be compatible with

Deleted: unique

LU11.3 Pedestrian-Oriented Commercial Centers. Encourage the development of commercial centers in compact, walkable configurations in Village centers that locate parking in the rear or on the side of the parcel, use transparent storefronts with active retail street fronting uses, minimize setbacks, and discourage "strip" commercial development. "Strip" commercial development consists of automobile-oriented

Goal LU-10 – Staff does not agree with deleting “unique” since the intention is to maintain the diverse character of the County.

LU-10.2 – Staff does not agree with proposed edits, as removing “require” would weaken policy. Staff feels it is essential to retain natural features in rural and semi-rural areas.

Goal LU-11 – Staff does not agree with proposed edits and feel that the words recommended to be deleted are essential to conveying the intention of this goal.

LU-11.2 – Edits generally incorporated as recommended.

RESPONSES

commercial development with the buildings set back from the street to accommodate parking between the building and street.

LU11.4 Town Center Intensity and Vitality. Encourage revitalization of Town Center areas to strengthen neighborhoods, expand local employment opportunities, and establish or enhance a sense of place.

LU11.5 Large Format Retail Stores. Allow large format retail uses, only where the scale of the use and design is compatible with the surrounding areas. Large format retail typically means retail stores with floor plans that are larger than 65,000 sq. ft.

Comment: "big box stores" is already defined in the policy.

Deleted: typically referred to as "big box stores."

LU-11.5 – Staff does not agree, as it is a common term that is generally recognized by the public.

LU11.6 Office Development. Locate new office development complexes within areas where services are available, in proximity to housing and along primary vehicular arterials (ideally with transit access) with internal vehicular and pedestrian linkages that integrate the new development into the Village transportation network where feasible.

Deleted: within Village

Deleted: public

LU-11.6 – Policy revised to incorporate minor edits, but retains "within Villages" as a key component of the policy. DPLU does not support Office Development outside of the Village Regional Category lands, which are traditionally not in close proximity to services and/or housing.

LU11.7 Office Development Compatibility with Adjoining Uses. Require compatibility in the scale, design, site layout, and circulation patterns of adjacent existing or planned commercial and residential development.

LU11.8 Permitted Secondary Uses. Provide a process where secondary land uses may be permitted when appropriate and compatible with the primary commercial, office, and light industrial uses, in order to better serve the daily needs of employees and to reduce the frequency of related automobile trips. This policy is not intended for high impact industrial uses.

LU11.9 Development Density and Scale Transitions. Locate transitions or buffers between lower intensity uses, such as low density residential districts, and higher intensity development, such as commercial or industrial uses. Buffering may be accomplished through increased setbacks or other techniques such as grade differentials, walls, and/or landscaping.

LU11.10 Integrity of Medium and High Impact Industrial Uses. Protect designated Medium and High Impact Industrial areas from encroachment of incompatible land uses, such as residences, schools, or other uses that are sensitive to industrial impacts. The intent of this policy is to retain the ability to utilize industrially designated locations by reducing future development conflicts.

LU11.11 Industrial Compatibility with Adjoining Uses. Require industrial land uses with outdoor activities or storage to provide a buffer from adjacent incompatible land uses.

LU-11.7 – Edits incorporated as recommended.

GOAL LU-12

Infrastructure and Services Supporting Development. Sustainable infrastructure, public facilities, and essential services that meet community needs and are provided concurrent with growth and development.

LU-12.1 Concurrency of Infrastructure and Services with Development.

Require the provision of infrastructure, facilities, and services needed by new development concurrent with that development, either directly or through fees. Where appropriate, the construction of infrastructure and facilities may be phased to coincide with project phasing.

LU-12.2 **Maintenance of Adequate Services.** Require development to [mitigate significant impacts to](#) existing service levels of public facilities or services for existing residents and businesses.

Comment: This policy should be rephrased to be consistent with CEQA. New development should not be required to maintain existing service levels if facilities are under-utilized/operating below full capacity. To be consistent with CEQA, the project needs to mitigate significant impacts to public facilities.

LU-12.3 **Infrastructure and Services Compatibility.** Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated [communities.](#)

LU-12.4 **Planning for Compatibility.** Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character and minimize visual and environmental impacts.

GOAL LU-13

Adequate Water Quality and Supply. A balanced and regionally integrated water management approach to ensure the long-term viability of San Diego County's water quality and supply.

LU-13.1 **Adequacy of Water Supply.** Coordinate land use planning with water infrastructure planning [in areas within the CWA boundary](#) to maintain an acceptable availability of a high quality water supply.

LU-13.2 **Commitment of Water Supply.** Require new development to identify adequate water resources to support the development prior to approval.

GOAL LU-14

RESPONSES

Deleted: maintain the

LU-12.2 – Edits incorporated as recommended.

Deleted: communities.¶

LU-12.3 – No changes are recommended.

LU-13.1 – This policy is intended to apply both inside and outside the CWA. Additional language has been added to provide further clarity.

RESPONSES

Adequate Wastewater Facilities. Communities with adequate wastewater disposal that address potential hazards to human health and the environment.

LU-14.1 Wastewater Facility Plans. Coordinate with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and assure consistency with the County's land use plans.

LU-14.2 Wastewater Disposal. Require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands.

LU-14.3 Wastewater Treatment Facilities. Require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency or permitted privately owned plants as part of home owners associations. Coordinate the planning and design of such facilities with the appropriate agency to be consistent with applicable sewer master plans.

LU-14.4 Sewer Facilities. Require sewer systems to be planned, developed, and sized to serve the land use pattern and densities depicted on the Land Use Map.

Comment: *The first part of this policy is highly subjective. The last part of the policy would preclude good infrastructure planning practices (getting homes off septic and on sewer). The Regional Categories and land use designations will drive density. Extending sewer service then should not be an issue. Incidentally, this policy would also preclude extending sewer service to employment lands which are not within an official "village" setting.*

LU-14.5 Alternate Sewage Disposal Systems. Support the use of alternative on-site sewage disposal systems, in conformance with State guidelines and regulations.

Comment: *Alternative septic systems have a well-documented and several decade-old history of outperforming conventional systems, including leading to substantially lower release of nitrates and other undesirable groundwater impacts. There is no good reason these systems are not allowed by-right throughout the County.*

GOAL LU-15

Deleted: Prohibit sewer facilities that would induce unplanned growth.

Deleted: Sewer systems and services shall not be extended beyond Village boundaries except when necessary to preserve open space or serve civic facilities.

Deleted: when conventional systems are not feasible

Deleted: and

LU-14.3 – Staff does not agree with proposed edits as it is DPLU's policy to require plants that serve more than one private property owner to be operated by a public agency.

LU-14.4 – Policy revised to provide better clarification.

LU-14.5 – Edits incorporated as recommended.

Adequate Wireless Communication Facilities. Wireless telecommunication facilities that utilize State-of-the-art techniques to minimize impacts to communities and the environment.

LU-15.1 **Telecommunication Facilities Compatibility with Setting.** Require that wireless telecommunication facilities be sited and designed to minimize visual impacts, adverse impacts to the natural environment, and are compatible with existing development and community character.

LU-15.2 **Co-Location of Telecommunication Facilities.** Encourage wireless telecommunication service providers to co-locate their facilities whenever appropriate, consistent with Community Plans and the Zoning Ordinance.

Staff does not see any recommended changes on this page.

GOAL LU-16

Appropriately Sited Waste Management Facilities. Solid waste management facilities that are appropriately located and sited in a manner that minimizes environmental impacts and potential conflicts from incompatible land uses, while facilitating recycling and resource recovery activities.

LU-16.1 **Location of Waste Management Facilities.** Site new solid waste management facilities identified in the San Diego County Integrated Waste Management Plan, in a manner that minimizes environmental impacts and prevents groundwater degradation, and in accordance with applicable local land use policies.

LU-16.2 **Integrity of Waste Management Facilities.** Avoid encroachment of incompatible land uses upon solid waste facilities in order to minimize or avoid potential conflicts.

LU-16.3 **New Waste Management Facilities.** Encourage the establishment of additional recycling and resource recovery facilities in areas with Industrial land use designations or other appropriate areas based on the type of recycling.

GOAL LU-17

Adequate Education. Quality schools that enhance our communities and mitigate for their impacts.

RESPONSES

LU-17.1 **Planning for Schools.** Encourage school districts to consider the population distribution as shown on the Land Use Map when planning for new school facilities.

LU-17.2 **Compatibility of Schools with Adjoining Uses.** Encourage school districts to minimize conflicts between schools and adjacent development through appropriate siting and adequate mitigation, addressing such issues as student drop-off/pick up locations, parking access, and security.

LU-17.3 **Priority School Locations.** Encourage school districts to locate schools within Village or Rural Village areas wherever possible and site and design them in a manner that provides the maximum opportunity for students to walk or bicycle to school.

LU-17.4 **Avoidance of Hazards.** Assist school districts with locating school facilities away from fault zones, flood or dam inundation zones, and hazardous materials storage areas in conformance with State statutes.

GOAL LU-18

Adequate Civic Uses. Civic uses that enhance community centers and places.

LU-18.1 **Compatibility of Civic Uses with Community Character.** Locate and design Civic uses and services to assure compatibility with the character of the community and adjoining uses, which pose limited adverse effects. Such uses may include libraries, meeting centers, and small swap meets, farmers markets, or other community gatherings.

LU-18.2 **Co-Location of Civic Uses.** Encourage the co-location of civic uses such as County library facilities, com

Staff does not see any recommended changes on this page.

Goals and Policies for Housing Element

RESPONSES

GOAL H1

Housing Development and Variety. A housing stock comprising a variety of housing and tenancy types at a range of prices, which meets the varied needs of existing and future unincorporated County residents, who represent a full spectrum of age, income, and other demographic characteristics.

Policies

H1.1 Sites Inventory for RHNA. Maintain an inventory of residential sites that can accommodate the Regional Housing Needs Allocation.

H1.2 Development Intensity Relative to Permitted Density. Encourage a development intensity of at least 80 percent of the maximum permitted gross density for sites designated at 15 to 30 dwelling units per acre in development projects.

H1.3 Housing near Public Services. Encourage the development of housing in areas served by transportation networks, within close proximity to job centers, and where public services and infrastructure are available.

H1.4 Special Needs Housing near Complementary Uses. Encourage the location of housing targeted to special needs groups, in close proximity to complementary commercial and institutional uses and services.

H1.5 Senior and Affordable Housing near Shopping and Services. Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping and services.

H1.6 Land for All Housing Types Provided in Villages. Provide opportunities for small lot single family, duplex, triplex, and other multi-family building types in Villages.

H1.7 Mix of Residential Development Types in Villages. Support the design of large-scale residential developments in Villages that include a range of housing types, lot sizes, and building sizes.

H1.8 Variety of Lot Sizes in Large-Scale Residential Developments. Promote large scale residential development in Semi-Rural that include a range of lot sizes to improve housing choice.

Comment: Inclusionary housing is a policy that has not been endorsed by the Board of Supervisors and should not be included. Inclusionary housing should be voluntary and incentive based, with participation by the county. See H3.5

Deleted: H1.9 Affordable Housing through General Plan Amendments. Require developers to provide an affordable housing component when requesting a General Plan amendment for a large scale residential project.¶

H-1.9 – Staff appreciates your comment, but does not concur that this policy mandates inclusionary housing. This policy is intended to affect only large-scale projects that require a GPA.

GOAL H2

Neighborhoods That Respect Local Character. Well designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.

Policies

H2.1 Development That Respects Community Character. Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element and Community Plans.

H2.2 Projects with Open Space Amenities in Villages. Require new multi-family projects in Villages to be well designed and include amenities and common open space areas that enhance overall quality of life.

GOAL H3

Housing Affordability for All Economic Segments. Affordable and suitable housing for all economic segments, with emphasis on the housing needs of lower income households and households with special needs.

Policies

H3.1 Federal Funding to Expand Affordable Housing. Pursue funding from federal, State, and local sources to expand affordable housing opportunities within the unincorporated County.

H-3.4 – Refer to comment on previous page.

H3.2 Equitable Share of Federal Funding. Advocate for an equitable share of available federal and State housing funds for subsidizing affordable housing development within unincorporated County areas.

H3.3 Density Bonus as a Means to Develop Affordable Housing. Provide a local density bonus program to encourage the development of housing affordable to lower income households and special needs households.

H3.4 Housing for Moderate Income Families in Villages. Facilitate the production of housing for moderate income families within Villages and Semi-Rural areas zoned for single family residential development.

Comment: see comments under H1.9 - Inclusionary housing.

Deleted: by permitting developments that offer affordable housing to incorporate other compatible housing types within

H3.5 Incentives for Developments with Lower Income Housing. Provide zoning and other incentives to support developments that incorporate housing for lower income households or households with special needs.

Comment: Support

H-3.5 – Your support is appreciated.

H3.6 Housing for Special Need Populations. Support programs that provide housing options for homeless individuals and families, particularly homeless farmworkers and day laborers.

RESPONSES

H-3.7 – Your support is appreciated.

H3.7 Alternative Affordable Housing Options. Provide programs that support the development of alternative types of affordable housing such as farmworker housing, second dwelling units, manufactured or mobile homes, shared housing, and employee or workforce housing.

Comment: Support

H3.8 Housing Services Support. Continue to provide fair housing and tenant/landlord services to residents and property owners and managers throughout the unincorporated area pursuant to federal and State Fair Housing laws.

GOAL H4

Affordable Housing Preservation. Programs that conserve housing currently available and affordable to lower income households, and programs that prevent or reverse deterioration in areas exhibiting symptoms of physical decline.

Policies

H4.1 Rehabilitation and Revitalization Strategies. Promote and support rehabilitation and revitalization strategies aimed at preserving the existing supply of affordable housing.

H4.2 Redevelopment of Deteriorated Housing. Encourage and support residential redevelopment in areas characterized by deteriorated housing.

GOAL H5

Constraints on Housing Development. Promote governmental policies or regulations that do not unnecessarily constrain the development, improvement, or conservation of market rate or affordable housing.

Policies

H5.1 Periodic Review of Housing Regulations. Periodically review and, if appropriate, revise development standards, regulations, and procedures to facilitate the development of housing, with priority given to low and moderate income households and households with special needs.

Comment: Strongly support

H5.2 Permit Processing Time. Reduce permit processing time and costs for projects with priority given to projects that produce housing for lower income households.

H5.3 Fire Protection. Work with local fire agencies to improve fire protection for multistory construction.

H5.4 Flexibility in Regulations. Modify regulations, as appropriate, to reflect desired densities and the unique characteristics of town center areas.

H-5.1 – Your support is appreciated.

GOAL H6

Delivery of Housing Services. An institutional framework that effectively delivers housing services and programs to implement the goals, policies, and programs of this Housing Element.

Policies

H6.1 Coordinated Delivery of Programs. Coordinate delivery of housing programs and services among various County departments.

H6.2 Ongoing Implementation Monitoring. Monitor progress in implementing the goals and objectives adopted in this Housing Element.

H6.3 Legislation That Recognizes Challenges of Unincorporated Communities. Pursue State level housing and land use legislation that recognizes the diversity of unincorporated communities and the associated challenges faced by County governments.

H6.4 Affordable Housing on Suitable County Owned Properties. Facilitate the development of affordable housing on suitable, County owned surplus properties.

H6.5 Redevelopment Districts as a Source of Revenue for Affordable Housing. Encourage the use of redevelopment districts to provide revenue for affordable housing construction or revitalization projects, and explore opportunities to improve the County's ability to form and manage these districts.

H6.6 Outreach for Affordable Housing. Promote the production and acceptance of affordable housing through educational outreach to developers, non-profit housing groups, the public, community groups, other jurisdictions, and County staff.

Staff does not see any recommended changes on this page.